

REMARKS

Reconsideration of this application, as amended, is respectfully requested. Claims 1, 19, and 20 have been amended to incorporate the features recited in claim 8, as originally filed. Hence, no new matter is being added. In addition, claim 19 has been amended for clarity.

Claim 1 overcomes the present rejection inasmuch as US Patent No. 6,597,815 to Satoh et al. (hereinafter "Satoh") fails to teach or suggest a method in which "the table [of encoded pixel parameter values] further comprises redundant entries, wherein each one of the redundant entries is decoded by recalling previously decoded pixel parameter values associated with each one of the redundant entries", as recited in claim 1. Recall, the Office Action considers an entire quantization table (e.g., a luminance quantization table or a chrominance quantization table) as an entry in the table recited in claim 1. In other words, the Office Action alleges it is possible to interpret the luminance quantization table and the chrominance quantization table as entries within "larger" and "general" quantization tables. (Office Action, page 2) For Satoh to teach the present feature, this general quantization table must have redundant entries (e.g., the luminance quantization table equal to the chrominance quantization table). However, Satoh teaches no such redundant entries. Hence, claim 1 is patentable over Satoh.

The Office Action cites Ladwig et al., US patent No. 6,247,014 (hereinafter, "Ladwig") for teaching "recalling previously [decoded?] values associated with each of the redundant entries". (Office Action, page 9) Even if true, Ladwig fails to cure the deficiencies of Satoh as the system of Satoh would fail if one were to decode redundant entries by recalling previously decoded pixel parameter values associated with each one of the redundant entries. This is the case, as decoded pixel parameter values do not just depend on quantization tables, but depend on *both* the quantized DCT coefficients as well as quantization tables. (Satoh, 1:39-49) Thus, even if there were redundant quantization tables (e.g., the luminance quantization table equal to the chrominance quantization table), by no means should the decoded pixel parameter values associated with the redundant quantization tables be identical. Recalling decoded values associated with, for example, the luminance quantization table for the chrominance quantization table just because the luminance and chrominance quantization tables are identical would lead to incorrect results if the quantized DCT coefficients associated with each quantization table are not identical.

It is noted that, in general, the likelihood that the chrominance quantization table and the luminance quantization table are identical is very rare, as 64 values would need to be identical.

Hence, there is no reasonable motivation to combine the teachings of Ladwig with Satoh (i.e., the likelihood of redundant entries is very rare), and if the combination were carried out, the system of Satoh would fail. Hence, claim 1 is patentable over Satoh in combination with Ladwig. (MPEP 2143.01 (V)-(VI))

Claims 2-18 depend from claim 1. For the reasons stated above, claim 1 is patentable over Satoh, even if considered in combination with Ladwig. Adding the teachings of Crawford (U.S. patent No. 5416614), Koshiba (U.S. patent No. 6933970), Basso (U.S. patent No. 6751623), and Boice (U.S. patent No. 6999511) fail to cure the above stated deficiencies of Satoh, and thus claims 2-18 should be patentable by virtue of their dependency from independent claim 1.

For at least the foregoing reasons, the claims are patentable over the references cited in the Office Action. If there are any additional fees due in connection with this communication, including fees for any extensions of time, please charge Deposit Account No. 19-3140.

Respectfully submitted,
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